

**STATEMENT OF DEFAULT**

Debtor(s): Eric C. Thomas

Case No. 19 B 11563 Chapter 13

Moving Creditor: Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust

Date Case Filed: 04/22/2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 8/22/2019

1. Collateral

- a. ☐ Home  
b. ☐ Car  
c. ☒ Other (describe) 8735 South Winchester Avenue, Chicago, IL 60620

2. Balance Owed as of Petition Date \$67,211.36  
Total of all other Liens against Collateral \$0

3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:  
\_\_\_\_\_

4. Estimated Value of Collateral (*must* be supplied in *all* cases) \$89,810.00

5. Default

- a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_  
b. ☒ Post-Petition Default  
i. ☐ On direct payments to the moving creditor  
Number of months 5 Amount \$3,324.56  
ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

- a. ☒ Lack of Adequate Protection §362(d)(1) \_\_\_\_\_  
i. ☐ No insurance  
ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_  
iii. ☒ Rapidly depreciating asset \_\_\_\_\_  
iv. ☐ Other \_\_\_\_\_  
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)  
c. ☐ Other "Cause" § 362(d)(1)  
i. ☐ Bad Faith (describe) \_\_\_\_\_  
ii. ☐ Multiple filings  
iii. ☐ Other (describe) \_\_\_\_\_  
d. Debtor's Statement of Intention regarding the Collateral  
i. ☐ Reaffirm ii. ☐ Redeem  
iii. ☐ Surrender iv. ☐ No Statement of Intentions Filed

Date: September 11, 2019

/s/ Kathryn A. Klein  
Attorney for Secured Creditor